

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 03-80660

HONORABLE NANCY G. EDMUNDS

D-1 LARRY E. BENNETT,

VIOLATION: 18 U.S.C. §§ 1343  
1346

OFFENSE: Wire Fraud/Theft of  
Honest Services

FILED: JULY 10, 2003

Defendant.

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INFORMATION

The United States of America, acting through its attorneys, charges:

I.

DESCRIPTION OF THE OFFENSE

1. Larry E. Bennett is made a defendant on the charge stated below.
2. Defendant, at all times relevant, lived in Plymouth, Michigan, which is located within the Eastern District of Michigan, and was president of Premiere Video, Inc., a company located in Livonia, Michigan that duplicated and distributed videotapes.
3. Defendant and an executive ("executive") of an audio-visual company located in Troy, Michigan ("company"), which buys licensing rights from television and movie programers, then packages these properties for retail sale as videotapes and DVDs, willfully devised a scheme to commit wire fraud by depriving the company of the honest services of one of its executives and

permitted the executive to obtain money by means of false or fraudulent pretenses in violation of Title 18 U.S.C. §§ 1343 and 1346.

4. The executive and the defendant willfully entered into a scheme to defraud in which the defendant agreed in a series of meetings and telephone calls to pay the executive monies in exchange for his continued support in contract negotiations, and to prevent Premiere's business with the company from being jeopardized. In so doing, the defendant willfully entered into a scheme to defraud. The scheme to defraud deprived the company of the honest services of its executive and permitted the executive to obtain monies by means of false or fraudulent pretenses.

## II. USE OF WIRES

5. As part of the scheme, and for the purpose of executing the scheme to defraud, on or about January 8, 2001, defendant willfully directed the transmission over interstate wires of a \$29,667 payment for the benefit of the executive. The defendant caused the wire transfer to cross from the Eastern District of Michigan, where the defendant was located, to Pennsylvania and ultimately to Arkansas for the purpose of furthering or executing the scheme to defraud, all in violation of Title 18, United States Code, Sections 1343, 1346.

## III. JURISDICTION AND VENUE

6. The scheme charged in this Information was devised and carried out, in part,

in the Eastern District of Michigan, within the five years preceding the filing  
of this Information.

IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1343 AND  
1346.

\_\_\_\_\_  
“/s/”  
R. HEWITT PATE  
Acting Assistant Attorney General

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“/s/”  
SCOTT M. WATSON  
Chief, Cleveland Field Office

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“/s/”  
JAMES M. GRIFFIN  
Deputy Assistant Attorney General

\_\_\_\_\_  
“/s/”  
KEVIN C. CULUM  
[3460--MT]

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“/s/”  
SCOTT D. HAMMOND  
Director of Criminal Enforcement  
  
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U.S. Department of Justice

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JEFFREY G. COLLINS  
United States Attorney  
Eastern District of Michigan

\_\_\_\_\_  
“/s/”  
ALAN GERSHEL  
Criminal Chief, E.D. Michigan

Dated: July 10, 2003